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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GERMAN ANTONIO LOPEZ-VELASQUEZ,
AND MARKO ANTONIO LOPEZ, and
LISA MARIE SANTOS,

Defendants.

CASE NO. 1:22-CR-00208 JLT-SKO

STIPULATION AND PROTECTIVE ORDER
BETWEEN THE UNITED STATES AND
DEFENDANT

COURT: Hon. Jennifer L. Thurston

WHEREAS, the discovery in this case is voluminous and contains a large amount of personal and confidential information including but not limited to dates of birth, telephone numbers, residential addresses, social security numbers and other confidential information ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

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1 THEREFORE, Defendants GERMAN ANTONIO LOPEZ-VELASQUEZ and MARKO
2 ANTONIO LOPEZ, by and through their counsel of record (“Defense Counsel”), and the United States
3 of America, by and through Assistant United States Attorney Jeffrey A. Spivak, hereby agree and
4 stipulate as follows:

5 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
6 Criminal Procedure, and its general supervisory authority.

7 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
8 part of discovery in this case (hereafter, collectively known as “the discovery”).

9 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any
10 documents that contain Protected Information with anyone other than Defense Counsel attorneys,
11 designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view
12 unredacted documents in the presence of his attorney, defense investigators, and support staff. The
13 parties agree that Defense Counsel, defense investigators, and support staff shall not allow the
14 Defendant to copy Protected Information contained in the discovery. The parties agree that Defense
15 Counsel, defense investigators, and support staff may provide the Defendant with copies of documents
16 from which Protected Information has been redacted.

17 4. The discovery and information therein may be used only in connection with the litigation
18 of this case and for no other purpose. The discovery is now and will forever remain the property of the
19 United States of America (“Government”). Defense Counsel will return the discovery to the
20 Government or certify that it has been shredded at the conclusion of the case.

21 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
22 ensure that it is not disclosed to third persons in violation of this agreement.

23 6. Defense Counsel shall be responsible for advising the Defendant, employees, and other
24 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

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7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

Dated: August 25, 2022

PHILLIP A. TALBERT
United States Attorney

By: /s/Jeffrey A. Spivak
JEFFREY A. SPIVAK
Assistant United States Attorney

Dated: August 25, 2022

By: /s/ Ryan Roth
RYAN ROTH
Attorney for Defendant
GERMAN ANTONIO LOPEZ-VELASQUEZ

Dated: August 30, 2022

By: /s/ W. Scott Quinlan
W. SCOTT QUINLAN
Attorney for Defendant
MARKO ANTONIO LOPEZ

Dated: August 25, 2022

By: /s/ Edward Robinson
EDWARD ROBINSON
Attorney for Defendant
LISA MARIE SANTOS

IT IS SO ORDERED.

Dated: 8/31/2022

Sheila K. Oberto
THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE